

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

ULYSSES RODRIGUEZ CHARLES,

Plaintiff,

V.

CITY OF BOSTON, et al.,

Defendants.

Case No. 04-10986

ASSENTED-TO MOTION TO SEAL PURSUANT TO LOCAL RULE 7.2

Non-party rape-victim, Karen K., by and through her attorney, respectfully moves this Court to seal the Complaint in the above-captioned action. As grounds for this motion, Karen K. states as follows:

1. On February 17, 2006, this Court granted the City of Boston's motion for a protective order with respect to the identities and confidential medical information of the rape victims. [*See* Order Re: Defendant's Motion for Protective Order, Docket No. 50].
2. The Complaint in this case, however, identifies each rape victim by first and last name.
3. As a result, on June 18, 2007, the Plaintiff filed an assented-to motion to correct the Complaint, attaching a redacted Complaint. The Court granted this motion on June 20, 2007.
4. Counsel for non-party rape victim, Karen K., now respectfully requests this Court, pursuant to LR 7.2 and the Protective Order, to issue an order sealing the original Complaint, which is currently active on the Court's CM/ECF system in its original form with the victims' full names included.

5. Counsel for Mr. Charles and the City of Boston assent to the relief requested herein.

WHEREFORE, non-party Karen K. respectfully requests that this Court issue an order sealing the original Complaint.

Respectfully submitted,

/s/ Helen Gerostathos Guyton

Helen Gerostathos Guyton, BBO No. 654631
Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, PC
701 Pennsylvania Avenue, N.W., Suite 900
Washington, D.C. 20004
Tel: 202.434.7300
Fax: 202.434.7400

Counsel for Karen K.

July 13, 2007

CERTIFICATE OF CONFERRAL

I, Helen Gerostathos Guyton, hereby certify that I conferred with Mayeti Gamechu, counsel for Mr. Charles, and John Roache, counsel for the City of Boston, in good faith and informed them on Karen K's intent to file this motion to seal. Ms. Gamechu and Mr. Roache assent to the relief requested herein.

/s/ Helen Gerostathos Guyton

CERTIFICATE OF SERVICE

I, Helen Gerostathos Guyton, hereby certify that a copy of the foregoing *Assented-To Motion to Seal Pursuant to Local Rule 7.2*, was served via this Court's CM/ECF system on all counsel of record on this 13th day of July, 2007.

/s/ Helen Gerostathos Guyton

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[PROPOSED] ORDER

For the reasons stated in the *Assented-To Motion to Seal Pursuant to Local Rule 7.2*, and good cause having been shown:

It is hereby **ORDERED** that the *Assented-To Motion to Seal Pursuant to Local Rule 7.2*, is hereby **GRANTED**. The parties are directed to re-file the Complaint in its redacted form.

Hon. Nancy Gertner